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|---|--|----------|------------------|----------|------------------|----------|----|
| Attorney or Party Name, Address, Telephone & FAX Nos., State Bar No. & Email Address CHRISTOPHER CELENTINO (131688) christopher.celementino@dinsmore.com CHRISTOPHER B. GHIO (259094) christopher.ghio@dinsmore.com YOSINA M. LISSEBECK (201654) yosina.lissebeck@dinsmore.com DINSMORE & SHOHL LLP 655 West Broadway, Suite 800 San Diego, CA 92101 Tele: 619.400.0500; Fax: 619.400.0500 KAREN S. HOCKSTAD (OH 61408) (Admitted pro hac vice) karen.hockstad@dinsmore.com MATTHEW H. SOMMER (OH 101721; NC 51004) (Admitted pro hac vice) matthew.sommer@dinsmore.com DINSMORE & SHOHL LLP 191 W. Nationwide Blvd, Suite 200 Columbus, OH 43215 Tele: 614.628.6930; Fax: 614.628.6890 Attorneys for Richard A. Marshack, Trustee of the LPG Liquidation Trust | FOR COURT USE ONLY | | | | | | |
| UNITED STATES BANKRUPTCY COURT CENTRAL DISTRICT OF CALIFORNIA - SANTA ANA DIVISION | | | | | | | |
| In re: The Litigation Practice Group P.C., <div style="text-align: center;">Debtor.</div> | <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 30%;">CASE NO.</td> <td>8:23-bk-10571-SC</td> </tr> <tr> <td>ADV. NO.</td> <td>8:25-ap-01105-SC</td> </tr> <tr> <td>CHAPTER:</td> <td>11</td> </tr> </table> | CASE NO. | 8:23-bk-10571-SC | ADV. NO. | 8:25-ap-01105-SC | CHAPTER: | 11 |
| CASE NO. | 8:23-bk-10571-SC | | | | | | |
| ADV. NO. | 8:25-ap-01105-SC | | | | | | |
| CHAPTER: | 11 | | | | | | |
| Richard A. Marshack, Trustee of the LPG Liquidation Trust, <div style="text-align: center;">Plaintiff,</div> v. World Global Fund, LLC et. al., <div style="text-align: center;">Defendant(s).</div> | <div style="text-align: center;"> NOTICE OF MOTION FOR ORDER WITHOUT A HEARING [LBR 9013-1(p) or (q)] </div> <div style="text-align: center; margin-top: 20px;"> [No hearing required] </div> | | | | | | |

TO THE U.S. TRUSTEE AND ALL PARTIES ENTITLED TO NOTICE, PLEASE TAKE NOTICE THAT:

1. Movant(s) Richard A. Marshack, Trustee of the LPG Liquidation Trust,
filed a motion or application (Motion) entitled Request for Clerk to Enter Default Under LBR 7055-1(a) against
MNS Funding LLC, d/b/a Legal Fees Network, dba The Genesis Equity Group.
2. Movant(s) requests that the court grant the motion without a hearing as provided for in:

☒ LBR 9013-1(p), which, in addition to notice via Notice of Electronic Filing, requires the motion to be served on additional parties as specified in LBR 7055-1(a); or

☐ LBR 9013-1(q), which requires service of the motion only on parties via Notice of Electronic Filing.
3. The motion is based upon the legal and factual grounds set forth in the motion. *(Check appropriate box below):*

☒ The full motion is attached to this notice; or

☐ The full motion was filed with the court as docket entry # ____, and a detailed description of the relief sought is attached to this notice.

This form is optional. It has been approved for use in the United States Bankruptcy Court for the Central District of California.

4. Movant will promptly lodge an order that the court may use to rule on the motion, as the court may rule on the motion without a hearing and without an opportunity for any party to file a request for a hearing,.

Respectfully submitted,

Date: 10/20/2025

/s/ Karen S. Hockstad
Signature of Movant or attorney for Movant

Karen S. Hockstad
Printed name of Movant or attorney for Movant

| | |
|--|--|
| <p>Attorney or Party Name, Address, Telephone & FAX Nos., State Bar No. & Email Address CHRISTOPHER CELENTINO (131688) christopher.celementino@dinsmore.com CHRISTOPHER B. GHIO (259094) christopher.ghio@dinsmore.com YOSINA M. LISSEBECK (201654) yosina.lissebeck@dinsmore.com DINSMORE & SHOHL LLP 655 West Broadway, Suite 800 San Diego, CA 92101 Tele: 619.400.0500; Fax: 619.400.0500</p> <p>KAREN S. HOCKSTAD (OH 61408) (Admitted pro hac vice) karen.hockstad@dinsmore.com MATTHEW H. SOMMER (OH 101721; NC 51004) (Admitted pro hac vice) matthew.sommer@dinsmore.com DINSMORE & SHOHL LLP 191 W. Nationwide Blvd, Suite 200 Columbus, OH 43215 Tele: 614.628.6930; Fax: 614.628.6890</p> <p><input type="checkbox"/> Plaintiff(s) appearing without attorney <input checked="" type="checkbox"/> Attorney for Plaintiff Richard A. Marshack, Trustee of the LPG Liquidation Trust</p> | <p>FOR COURT USE ONLY</p> |
| <p style="text-align: center;">UNITED STATES BANKRUPTCY COURT CENTRAL DISTRICT OF CALIFORNIA - SANTA ANA DIVISION</p> | |
| <p>In re: The Litigation Practice Group P.C.,</p> <p style="text-align: right;">Debtor(s).</p> <p>Richard A. Marshack, Trustee of the LPG Liquidation Trust, Plaintiff(s),</p> <p style="text-align: center;">vs.</p> <p>World Global Fund, LLC, et al.</p> <p style="text-align: right;">Defendant(s).</p> | <p>CASE NO.: 8:23-bk-10571-SC CHAPTER 11 ADVERSARY NO.: 8:25-ap-01105-SC</p> <p style="text-align: center;">REQUEST FOR CLERK TO ENTER DEFAULT UNDER LBR 7055-1(a)</p> <p style="text-align: center;">[No Hearing Required]</p> |

TO THE DEFENDANT, DEFENDANT'S ATTORNEY AND OTHER INTERESTED PARTIES:

MNS Funding LLC, d/b/a Legal Fees Network, d/b/a The

1. Name of Defendant against whom default is sought: Genesis Equity Group
2. Plaintiff filed the complaint in this adversary proceeding on (specify date): 3/10/2025
3. The summons and complaint were served on Defendant by ☐ Personal Service ☒ Mail Service
on the following date (specify date): 3/18/2025
4. A conformed copy of the executed service of summons form is attached hereto as Exhibit A and the Declaration of Karen Hockstad is attached hereto as Exhibit B.

This form is mandatory. It has been approved for use in the United States Bankruptcy Court for the Central District of California.

5. The time for filing an answer or other responsive pleading expired on (*specify date*): 10/14/2025
6. No answer or other responsive pleading has been filed or served by Defendant.

WHEREFORE, Plaintiff requests that the clerk of the court enter a default against this Defendant.

Date: October 20, 2025

/s/ Karen S. Hockstad

Signature

Karen S. Hockstad

Printed name of Plaintiff or attorney for Plaintiff

EXHIBIT A

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AP-Summons Page 1 of 5

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|---|---|
| Attorney or Party Name, Address, Telephone & FAX Nos., State Bar No. & Email Address Karen Hockstad Dinsmore & Shohl, LLP 191 W. Nationwide Blvd Ste 200 Columbus, OH 43215 (614) 628-6930 <i>Plaintiff or Attorney for Plaintiff</i> | FOR COURT USE ONLY |
| UNITED STATES BANKRUPTCY COURT CENTRAL DISTRICT OF CALIFORNIA - SANTA ANA | |
| In re: The Litigation Practice Group P.C. <div style="text-align: right;">Debtor(s).</div> | CASE NO.: 8:23-bk-10571-SC CHAPTER: 11 ADVERSARY NUMBER: 8:25-ap-01105-SC |
| Richard A Marshack <div style="text-align: center;">Versus</div> World Global Fund LLC (See Attachment A for names of additional defendants) <div style="text-align: right;">Defendant(s)</div> | SUMMONS AND NOTICE OF STATUS CONFERENCE IN ADVERSARY PROCEEDING [LBR 7004-1] |

TO THE DEFENDANT(S): A Complaint has been filed by the Plaintiff against you. If you wish to defend against the Complaint, you must file with the court a written pleading in response to the Complaint. You must also serve a copy of your written response on the party shown in the upper left-hand corner of this page. The deadline to file and serve a written response is 04/14/2025. If you do not timely file and serve the response, the court may enter a judgment by default against you for the relief demanded in the Complaint.

A status conference in the adversary proceeding commenced by the Complaint has been set for:

Date: May 28, 2025
Time: 01:30 PM
Hearing Judge: Scott C Clarkson
Location: 411 W Fourth St., Ctrrm 5C, Santa Ana, CA 92701

This form is mandatory. It has been approved for use in the United States Bankruptcy Court for the Central District of California.

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You must comply with LBR 7016-1, which requires you to file a joint status report and to appear at a status conference. All parties must read and comply with the rule, even if you are representing yourself. You must cooperate with the other parties in the case and file a joint status report with the court and serve it on the appropriate parties at least 14 days before a status conference. A court-approved joint status report form is available on the court's website (LBR form F 7016-1.STATUS.REPORT) with an attachment for additional parties if necessary (LBR form F 7016-1.STATUS.REPORT.ATTACH). If the other parties do not cooperate in filing a joint status report, you still must file with the court a unilateral status report and the accompanying required declaration instead of a joint status report 7 days before the status conference. The court may fine you or impose other sanctions if you do not file a status report. The court may also fine you or impose other sanctions if you fail to appear at a status conference.

**KATHLEEN J. CAMPBELL
CLERK OF COURT**

Date of Issuance of Summons and Notice of Status Conference in Adversary Proceeding: March 13, 2025

By: "s/" Nickie Bolte
Deputy Clerk



This form is mandatory. It has been approved for use in the United States Bankruptcy Court for the Central District of California.

December 2016

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F 7004-1.SUMMONS.ADV.PROC

ATTACHMENT A
Names of plaintiffs and defendants

| Plaintiff(s): | Defendant(s): |
|--------------------|---|
| Richard A Marshack | World Global Fund LLC WORLD GLOBAL FUND LLC Shia Dembitzer Solomon Feig Moishe Gubin Optimum Bank Holdings, Inc. Optimumbank Optimumbank.com LPG Capital LLC LPG Holdings LLC MNS Funding LLC SSD Investment Group, LLC SSD Investment Group, LLC SSD Investment Group, LLC Brickstone Group LTD WGF Capital Inc. PSF 2020 Inc. PSF LLC Supreme Advance LLC Slate Advance LLC Safe Vault Capital LLC Goldcrest Associates LLC Parkside Capital Group LLC Hybrid Advance LLC EOM Business Capital LLC Genesis Equity Group Funding LLC Everyday Group LLC Glass media Funding Gateway, Inc. Funding Gateway, Inc. Funding Gateway, Inc. Coast Processing LLC Vertex Capital (US) Funding LLC Vertex Capital Partners LLC Crystal Springs Capital LLC Weinman and Associates, LLC World Global Fund LLC Prime Funding Group Coast Processing LLC TOT Capital Hybrid Advance Gateway Funding Dorcy and Whitney W.B.Fund Brickstone Group Branfman and Associates Slate Advance FD Fund PSF Greentree Advance Crystal Springs Kingdom Capital Parkside Capital Goldcrest Rapid Cap Weinman and Associates WGF Capital Inc. Everyday Group Vulcan Consulting Group Supreme Funding Vertex Capital Kingcash MNS Funding |

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LPG
AY Funding
Safe Vault
Legal Fees Network
The Genesis Equity Group
WORLD GLOBAL
Weinman and Associates

This form is mandatory. It has been approved for use in the United States Bankruptcy Court for the Central District of California.

ATTACHMENT A

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is: 191 W. Nationwide Blvd., Suite 200, Columbus, Ohio 43215

A true and correct copy of the foregoing documents: (1) SUMMONS AND NOTICE OF STATUS CONFERENCE IN ADVERSARY PROCEEDING [LBR 7004-1] and (2) the accompanying pleading(s) entitled: TRUSTEE'S COMPLAINT FOR: (1) AVOIDANCE, RECOVERY, AND PRESERVATION OF 2-YEAR ACTUAL FRAUDULENT TRANSFERS; (2) AVOIDANCE, RECOVERY, AND PRESERVATION OF 2-YEAR CONSTRUCTIVE FRAUDULENT TRANSFERS; (3) DEMAND FOR ACCOUNTING AGAINST WORLD GLOBAL FUND, LLC, OPTIMUMBANK HOLDINGS, INC., OPTIMUMBANK, AND OPTIMUMBANK.COM; (4) TURNOVER OF ESTATE PROPERTY; (5) FRAUD AND/OR CONVERSION/THEFT COMMITTED BY WORLD GLOBAL, LLC, DEMBITZER, FEIG, THE ALTER EGOS, AND THE DEMBITZER ALTER EGOS – THE FRAUDULENT ACH TRANSACTIONS; (6) FRAUD AND/OR CONVERSION/THEFT COMMITTED BY WORLD GLOBAL, LLC, DEMBITZER, FEIG, THE ALTER EGOS AND THE DEMBITZER ALTER EGOS – UNREIMBURSED FUNDS FROM THE MCA AGREEMENTS; (7) AIDING AND ABETTING FRAUD AND/OR CONVERSION/THEFT BY MOISHE GUBIN, OPTIMUMBANK HOLDINGS, INC., OPTIMUMBANK, AND OPTIMUMBANK.COM; (8) AIDING AND ABETTING BY MOISHE GUBIN, OPTIMUMBANK HOLDINGS, INC., OPTIMUMBANK, OPTIMUMBANK.COM; AND (9) CONSPIRACY TO COMMIT FRAUD

Order re: EARLY MEETING OF COUNSEL, STATUS CONFERENCE INSTRUCTIONS, AND GENERAL PROCEDURES and

NOTICE OF REQUIRED COMPLIANCE WITH RULE 7026 OF THE FEDERAL RULES OF BANKRUPTCY PROCEDURE AND RULE 7026-1 OF THE LOCAL BANKRUPTCY RULES

will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

1. **TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On _____, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☐ Service information continued on attached page

2. **SERVED BY UNITED STATES MAIL:**

On March 18, 2025, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☒ Service information continued on attached page

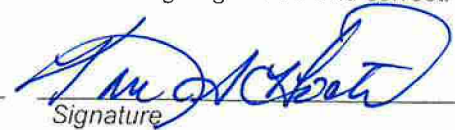
3. **SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served):** Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on March 18, 2025, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

March 18, 2025
Date

Karen S. Hockstad
Printed Name


Signature

Service by U.S. Mail

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| 1. | <u>DEFENDANT</u> Brickstone Group, Ltd. 20 W. 47 th Street, Suite 401 New York, NY 10016 | <u>Agent for Service of Process:</u> Brickstone Group, Ltd. New York Secretary of State- as agent for service of process One Commerce Plaza, 99 Washington Avenue Albany, NY 10036 | <u>Agent for Service of Process</u> Brickstone Group, Ltd. Rabia Yaghoubazadeh 1486 Fulton Street. Suite 401 Brooklyn, NY 11216 |
| 2. | <u>DEFENDANT</u> Coast Processing, LLC 7901 4th Street, Suite 5765 St. Petersburg, FL 33702 | <u>Agent for Service of Process</u> Coast Processing, LLC Business Filings, Inc. 1200 S. Pine Island Road Plantation, FL 33702 | |
| 3. | <u>DEFENDANT</u> Crystal Springs Capital LLC | <u>Agent for Service of Process</u> Crystal Springs Capital, LLC c/o Mark David, Registered Agent 1111 Brickell Avenue, Suite 2725 Miami, FL 33131 | <u>Agent for Service of Process</u> Crystal Springs Capital LLC c/o SKD Holdings LLC 4034 Willow Grove Road Camden, DE 19934 |
| 4. | <u>DEFENDANT</u> EOM Business Capital LLC c/o The Limited Liability Company 4615 Surf Avenue Brooklyn, NY 11224 | <u>Agent for Service of Process</u> EOM Business Capital LLC New York Secretary of State- as agent for service of process One Commerce Plaza, 99 Washington Avenue Albany, NY 12231 | |
| 5. | <u>DEFENDANT</u> Everyday Group, LLC c/o The LLC 63 Flushing Avenue, Unit 148 Brooklyn, NY 11205 | <u>Agent for Service of Process</u> Everyday Group, LLC New York Secretary of State- as agent for service of process One Commerce Plaza, 99 Washington Avenue Albany, NY 12231 | |
| 6. | <u>DEFENDANT</u> Funding Gateway, Inc. c/o The Corporation 5314 16th Avenue, Suite 139 Brooklyn, NY 11204 | <u>Agent for Service of Process</u> Funding Gateway, Inc. New York Secretary of State- as agent for service of process One Commerce Plaza, 99 Washington Avenue Albany, NY 12231 | |

Service by U.S. Mail

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| 7. | <u>DEFENDANT</u> Funding Gateway, Inc. 330 Changebridge Road, Suite 101 Pine Brook, NJ 07058 | <u>Agent for Service of Process</u> Funding Gateway, Inc. c/o File Right RA Services, LLC 330 Changebridge Road, Suite 101 Pine Brook, NJ 07058 | |
| 8. | <u>DEFENDANT</u> Funding Gateway, Inc. 1309 Coffeen Avenue, Suite 1200 Sheridan, WY 82801 | <u>Agent for Service of Process</u> Funding Gateway, Inc. Wyoming Secretary of State- as agent for service of process 122 West 25th Street, Suite 101 Cheyenne, WY 82002 | <u>Agent for Service of Process</u> Funding Gateway, Inc. Cloud Peak Law 1095 Sugar View Drive, Suite 500 Sheridan, WY 82801 |
| 9. | <u>DEFENDANT</u> Funding Gateway, Inc. d/b/a Goldcrest 1309 Coffeen Avenue, Suite 1200 Sheridan, WY 82801 | <u>Agent for Service of Process</u> Funding Gateway, Inc. d/b/a Goldcrest Cloud Peak Law 1095 Sugar View Drive, Suite 500 Sheridan, WY 82801 | <u>Agent for Service of Process</u> Funding Gateway, Inc. d/b/a Goldcrest Wyoming Secretary of State-as agent for service of process 122 West 25th Street, Suite 101 Cheyenne, WY 82002 |
| 10. | <u>DEFENDANT</u> Funding Gateway, Inc. d/b/a Hybrid Advance 1309 Coffeen Avenue, Suite 1200 Sheridan, WY 82801 | <u>Agent for Service of Process</u> Funding Gateway, Inc. d/b/a Hybrid Advance Cloud Peak Law 1095 Sugar View Drive, Suite 500 Sheridan, WY 82801 | <u>Agent for Service of Process</u> Funding Gateway, Inc. d/b/a Hybrid Advance Wyoming Secretary of State-as agent for service of process 122 West 25th Street, Suite 101 Cheyenne, WY 82002 |
| 11. | <u>DEFENDANT</u> Funding Gateway, Inc. d/b/a Supreme Advance 1309 Coffeen Avenue, Suite 1200 Sheridan, WY 82801 | <u>Agent for Service of Process</u> Funding Gateway, Inc. d/b/a Supreme Advance Cloud Peak Law 1095 Sugar View Drive, Suite 500 Sheridan, WY 82801 | <u>Agent for Service of Process</u> Funding Gateway, Inc. d/b/a Supreme Advance Wyoming Secretary of State-as agent for service of process 122 West 25th Street, Suite 101 Cheyenne, WY 82002 |
| 12. | <u>DEFENDANT</u> Funding Gateway, Inc. d/b/a Weinman and Associates 1309 Coffeen Avenue, Suite 1200 Sheridan, WY 82801 | <u>Agent for Service of Process</u> Funding Gateway, Inc. d/b/a Weinman and Associates Cloud Peak Law 1095 Sugar View Drive, Suite 500 Sheridan, WY 82801 | <u>Agent for Service of Process</u> Funding Gateway, Inc. d/b/a Weinman and Associates Wyoming Secretary of State-as agent for service of process 122 West 25th Street, Suite 101 Cheyenne, WY 82002 |

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| 13. | <u>DEFENDANT</u> Funding Gateway, Inc. d/b/a World Global Fund 1309 Coffeen Avenue, Suite 1200 Sheridan, WY 82801 | <u>Agent for Service of Process</u> Funding Gateway, Inc. d/b/a World Global Fund Cloud Peak Law 1095 Sugar View Drive, Suite 500 Sheridan, WY 82801 | <u>Agent for Service of Process</u> Funding Gateway, Inc. d/b/a World Global Fund Wyoming Secretary of State-as agent for service of process 122 West 25th Street, Suite 101 Cheyenne, WY 82002 |
| 14. | <u>DEFENDANT</u> Genesis Equity Group Funding, LLC 5308 13th Avenue, Suite 422 Brooklyn, NY 11219 | <u>Agent for Service of Process</u> Genesis Equity Group Funding, LLC New York Secretary of State- as agent for service of process One Commerce Plaza, 99 Washington Avenue Albany, NY 11231 | |
| 15. | <u>DEFENDANT</u> Goldcrest Associates, LLC c/o The LLC 1253 E. 28th Street Brooklyn, NY 11210 | <u>Agent for Service of Process</u> Goldcrest Associates, LLC New York Secretary of State- as agent for service of process One Commerce Plaza, 99 Washington Avenue Albany, NY 11231 | |
| 16. | <u>DEFENDANT</u> Hybrid Advance LLC | <u>Agent for Service of Process</u> Hybrid Advance LLC c/o Areil Llyabayev 9918 62nd Drive Rego Park, NY 11374 | <u>Agent for Service of Process</u> Hybrid Advance, LLC New York Secretary of State-as agent for service of process One Commerce Plaza, 99 Washington Avenue Albany, NY 11231 |
| 17. | <u>DEFENDANT</u> LPG Capital, LLC 10 Jill Lane Monsey, NY 10952 | <u>Agent for Service of Process</u> LPG Capital, LLC New York Secretary of State- as agent for service of process One Commerce Plaza, 99 Washington Avenue Albany, NY 11231 | |
| 18. | <u>DEFENDANT</u> LPG Holdings, LLC 30 N. Gould, Suite R Sheridan, WY 82801 | <u>Agent for Service of Process</u> LPG Holdings, LLC Wyoming Secretary of State- as agent for service of process 122 West 25 th Street, Suite 101 Cheyenne, WY 82002 | <u>Agent for Service of Process</u> LPG Holdings, LLC c/o Registered Agents, Inc. 30 N. Gould, Suite R Sheridan, WY 82801 |

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| 19. | <u>DEFENDANT</u> MNS Funding, LLC | <u>Agent for Service of Process</u> MNS Funding, LLC c/o File Right LLC 5314 16th Avenue, Suite 139 Brooklyn, NY 11204 | <u>Agent for Service of Process</u> MNS Funding, LLC New York Secretary of State-as agent for service of process One Commerce Plaza, 99 Washington Avenue Albany, NY 11231 |
| 20. | <u>DEFENDANT</u> MNS Funding, LLC d/b/a Genesis Equity Group c/o The LLC 5314 16th Avenue, Suite 139 Brooklyn, NY 11204 | <u>Agent for Service of Process</u> MNS Funding, LLC d/b/a Genesis Equity Group New York Secretary of State- as agent for service of process One Commerce Plaza, 99 Washington Avenue Albany, NY 11231 | |
| 21. | <u>DEFENDANT</u> MNS Funding, LLC d/b/a Legal Fees Network c/o The LLC 5314 16th Avenue, Suite 139 Brooklyn, NY 11204 | <u>Agent for Service of Process</u> MNS Funding, LLC d/b/a Legal Fees Network New York Secretary of State- as agent for service of process One Commerce Plaza, 99 Washington Avenue Albany, NY 11231 | |
| 22. | <u>DEFENDANT</u> Moishe Gubin 1230 Ridgedale Road South Bend, IN 46614 | | |
| 23. | <u>DEFENDANT</u> Parkside Capital Group, LLC | <u>Agent for Service of Process</u> Parkside Capital Group, LLC c/o USA Corp, Inc. 325 Division Avenue, Suite 201 Brooklyn, NY 11211 | <u>Agent for Service of Process</u> Parkside Capital Group, LLC New York Secretary of State-as agent for service of process One Commerce Plaza, 99 Washington Avenue Albany, NY 11231 |
| 24. | <u>DEFENDANT</u> PSF 2020, Inc. c/o The Corporation 3921 14th Avenue Brooklyn, NY 11218 | <u>Agent</u> PSF 2020, Inc. New York Secretary of State- as agent for service of process One Commerce Plaza, 99 Washington Avenue Albany, NY 11231 | |

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| 25. | <u>DEFENDANT</u> Safe Vault Capital, LLC c/o The Company 12 Bayview Avenue, Suite 321 Lawrence, NY 11599 | <u>Agent for Service of Process</u> Safe Vault Capital, LLC New York Secretary of State- as agent for service of process One Commerce Plaza, 99 Washington Avenue Albany, NY 11231 | |
| 26. | <u>DEFENDANT</u> Shia Dembitzer 202 Foster Avenue, Apt. 5 Brooklyn, NY 11230 | | |
| 27. | <u>DEFENDANT</u> Slate Advance, LLC c/o The LLC 15 America Avenue, Suite 3 Lakewood, NY 08701 | <u>Agent for Service of Process</u> Slate Advance, LLC New York Secretary of State- as agent for service of process One Commerce Plaza, 99 Washington Avenue Albany, NY 11231 | |
| 28. | <u>DEFENDANT</u> Solomon Feig 4518 18th Avenue Brooklyn, NY 11204 | | |
| 29. | <u>DEFENDANT</u> SSD Investment Group, LLC 14400 Bear Valley Rd., Space 527 Victorville, CA 92394 | <u>Agent for Service of Process</u> SSD Investment Group, LLC c/o Natesh Singh Dole 13745 Holt Ct. Victorville, CA 92394 | <u>Agent for Service of Process</u> SSD Investment Group, LLC Attn: Shia Dembitzer 7901 4th Street N., Suite 5765 St. Petersburg, FL 33702 |
| 30. | <u>DEFENDANT</u> Supreme Advance, LLC | <u>Agent for Service of Process</u> Supreme Advance, LLC c/o File Right, LLC 5314 16th Avenue, Suite 139 Brooklyn, NY 11204 | <u>Agent for Service of Process</u> Supreme Advance, LLC New York Secretary of State-as agent for service of process One Commerce Plaza, 99 Washington Avenue Albany, NY 11231 |
| 31. | <u>DEFENDANT</u> Vertex Capital (US) Funding LLC 1309 Coffeen Avenue, Suite 10947 Sheridan, WY 82801 | <u>Agent for Service of Process</u> Vertex Capital (US) Funding LLC Cloud Peak Law 1095 Sugar View Drive, Suite 500 Sheridan, WY 82801 | <u>Agent for Service of Process</u> Vertex Capital (US) Funding LLC Wyoming Secretary of State-as agent for service of process 122 West 25th Street, Suite 101 Cheyenne, WY 82002 |

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| 32. | <u>DEFENDANT</u> Vertex Capital Partners, LLC | <u>Agent for Service of Process</u> Vertex Capital Partners, LLC c/o Registered Agents, Inc. 30 N. Gould, Suite R Sheridan, WY 82801 | <u>Agent for Service of Process</u> Vertex Capital Partners, LLC Wyoming Secretary of State-as agent for service of process 122 West 25th Street, Suite 101 Cheyenne, WY 82002 |
| 33. | <u>DEFENDANT</u> Weinman and Associates, LLC | <u>Agent for Service of Process</u> Weinman and Associates, LLC c/o Cloud Peak Law 1095 Sugar View Drive, Suite 500 Sheridan, WY 82801 | <u>Agent for Service of Process</u> Weinman and Associates, LLC Wyoming Secretary of State-as agent for service of process 122 West 25th Street, Suite 101 Cheyenne, WY 82002 |
| 34. | <u>DEFENDANT</u> WGF Capital (US) Inc. | <u>Agent for Service of Process</u> WGF Capital (US) Inc. c/o Joshua Feig 1846 50th Street Brooklyn, NY 11204 | <u>Agent for Service of Process</u> WGF Capital (US) Inc. New York Secretary of State-as agent for service of process One Commerce Plaza, 99 Washington Avenue Albany, NY 11231 |
| 35. | <u>DEFENDANT</u> World Global Fund, LLC | <u>Agent</u> World Global Fund, LLC c/o File Right LLC 5314 16th Avenue, Suite 139 Brooklyn, NY 11204 | <u>Agent for Service of Process</u> World Global Fund, LLC New York Secretary of State-as agent for service of process One Commerce Plaza, 99 Washington Avenue Albany, NY 11231 |
| 36. | <u>DEFENDANT</u> WORLD GLOBAL FUND, LLC d/b/a AY Funding | <u>Agent</u> WORLD GLOBAL FUND, LLC d/b/a AY Funding c/o File Right LLC 5314 16th Avenue, Suite 139 Brooklyn, NY 11204 | <u>Agent for Service of Process</u> WORLD GLOBAL FUND, LLC d/b/a AY Funding New York Secretary of State-as agent for service of process One Commerce Plaza, 99 Washington Avenue Albany, NY 11231 |
| 37. | <u>DEFENDANT</u> WORLD GLOBAL FUND, LLC d/b/a Braufman and Associates | <u>Agent</u> WORLD GLOBAL FUND, LLC d/b/a Braufman and Associates c/o File Right LLC 5314 16th Avenue, Suite 139 Brooklyn, NY 11204 | <u>Agent for Service of Process</u> WORLD GLOBAL FUND, LLC d/b/a Braufman and Associates New York Secretary of State-as agent for service of process One Commerce Plaza, 99 Washington Avenue Albany, NY 11231 |

Service by U.S. Mail

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| 38. | <u>DEFENDANT</u> WORLD GLOBAL FUND, LLC d/b/a Brickstone Group | <u>Agent</u> WORLD GLOBAL FUND, LLC d/b/a Brickstone Group c/o File Right LLC 5314 16th Avenue, Suite 139 Brooklyn, NY 11204 | <u>Agent for Service of Process</u> WORLD GLOBAL FUND, LLC d/b/a Brickstone Group New York Secretary of State-as agent for service of process One Commerce Plaza, 99 Washington Avenue Albany, NY 11231 |
| 39. | <u>DEFENDANT</u> WORLD GLOBAL FUND, LLC d/b/a Coast Processing | <u>Agent</u> WORLD GLOBAL FUND, LLC d/b/a Coast Processing c/o File Right LLC 5314 16th Avenue, Suite 139 Brooklyn, NY 11204 | <u>Agent for Service of Process</u> WORLD GLOBAL FUND, LLC d/b/a Coast Processing New York Secretary of State-as agent for service of process One Commerce Plaza, 99 Washington Avenue Albany, NY 11231 |
| 40. | <u>DEFENDANT</u> WORLD GLOBAL FUND, LLC d/b/a Crystal Springs | <u>Agent</u> WORLD GLOBAL FUND, LLC d/b/a Crystal Springs c/o File Right LLC 5314 16th Avenue, Suite 139 Brooklyn, NY 11204 | <u>Agent for Service of Process</u> WORLD GLOBAL FUND, LLC d/b/a Crystal Springs New York Secretary of State-as agent for service of process One Commerce Plaza, 99 Washington Avenue Albany, NY 11231 |
| 41. | <u>DEFENDANT</u> WORLD GLOBAL FUND, LLC d/b/a Dorcy & Whitney | <u>Agent</u> WORLD GLOBAL FUND, LLC d/b/a Dorcy & Whitney c/o File Right LLC 5314 16th Avenue, Suite 139 Brooklyn, NY 11204 | <u>Agent for Service of Process</u> WORLD GLOBAL FUND, LLC d/b/a Dorcy & Whitney New York Secretary of State-as agent for service of process One Commerce Plaza, 99 Washington Avenue Albany, NY 11231 |
| 42. | <u>DEFENDANT</u> WORLD GLOBAL FUND, LLC d/b/a Everyday Group | <u>Agent</u> WORLD GLOBAL FUND, LLC d/b/a Everyday Group c/o File Right LLC 5314 16th Avenue, Suite 139 Brooklyn, NY 11204 | <u>Agent for Service of Process</u> WORLD GLOBAL FUND, LLC d/b/a Everyday Group New York Secretary of State-as agent for service of process One Commerce Plaza, 99 Washington Avenue Albany, NY 11231 |

Service by U.S. Mail

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| 43. | <u>DEFENDANT</u> WORLD GLOBAL FUND, LLC d/b/a FD Fund | <u>Agent</u> WORLD GLOBAL FUND, LLC d/b/a FD Fund c/o File Right LLC 5314 16th Avenue, Suite 139 Brooklyn, NY 11204 | <u>Agent for Service of Process</u> WORLD GLOBAL FUND, LLC d/b/a FD Fund New York Secretary of State-as agent for service of process One Commerce Plaza, 99 Washington Avenue Albany, NY 11231 |
| 44. | <u>DEFENDANT</u> WORLD GLOBAL FUND, LLC d/b/a Gateway Funding | <u>Agent</u> WORLD GLOBAL FUND, LLC d/b/a Gateway Funding c/o File Right LLC 5314 16th Avenue, Suite 139 Brooklyn, NY 11204 | <u>Agent for Service of Process</u> WORLD GLOBAL FUND, LLC d/b/a Gateway Funding New York Secretary of State-as agent for service of process One Commerce Plaza, 99 Washington Avenue Albany, NY 11231 |
| 45. | <u>DEFENDANT</u> WORLD GLOBAL FUND, LLC d/b/a Goldcrest | <u>Agent</u> WORLD GLOBAL FUND, LLC d/b/a Goldcrest c/o File Right LLC 5314 16th Avenue, Suite 139 Brooklyn, NY 11204 | <u>Agent for Service of Process</u> WORLD GLOBAL FUND, LLC d/b/a Goldcrest New York Secretary of State-as agent for service of process One Commerce Plaza, 99 Washington Avenue Albany, NY 11231 |
| 46. | <u>DEFENDANT</u> WORLD GLOBAL FUND, LLC d/b/a Greentree Advance | <u>Agent</u> WORLD GLOBAL FUND, LLC d/b/a Greentree Advance c/o File Right LLC 5314 16th Avenue, Suite 139 Brooklyn, NY 11204 | <u>Agent for Service of Process</u> WORLD GLOBAL FUND, LLC d/b/a Greentree Advance New York Secretary of State-as agent for service of process One Commerce Plaza, 99 Washington Avenue Albany, NY 11231 |
| 47. | <u>DEFENDANT</u> WORLD GLOBAL FUND, LLC d/b/a Hybrid Advance | <u>Agent</u> WORLD GLOBAL FUND, LLC d/b/a Hybrid Advance c/o File Right LLC 5314 16th Avenue, Suite 139 Brooklyn, NY 11204 | <u>Agent for Service of Process</u> WORLD GLOBAL FUND, LLC d/b/a Hybrid Advance New York Secretary of State-as agent for service of process One Commerce Plaza, 99 Washington Avenue Albany, NY 11231 |

Service by U.S. Mail

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| 48. | <u>DEFENDANT</u> WORLD GLOBAL FUND, LLC d/b/a Kingcash | <u>Agent</u> WORLD GLOBAL FUND, LLC d/b/a Kingcash c/o File Right LLC 5314 16th Avenue, Suite 139 Brooklyn, NY 11204 | <u>Agent for Service of Process</u> WORLD GLOBAL FUND, LLC d/b/a Kingcash New York Secretary of State-as agent for service of process One Commerce Plaza, 99 Washington Avenue Albany, NY 11231 |
| 49. | <u>DEFENDANT</u> WORLD GLOBAL FUND, LLC d/b/a Kingdom Capital | <u>Agent</u> WORLD GLOBAL FUND, LLC d/b/a Kingdom Capital c/o File Right LLC 5314 16th Avenue, Suite 139 Brooklyn, NY 11204 | <u>Agent for Service of Process</u> WORLD GLOBAL FUND, LLC d/b/a Kingdom Capital New York Secretary of State-as agent for service of process One Commerce Plaza, 99 Washington Avenue Albany, NY 11231 |
| 50. | <u>DEFENDANT</u> WORLD GLOBAL FUND, LLC d/b/a LPG | <u>Agent</u> WORLD GLOBAL FUND, LLC d/b/a LPG c/o File Right LLC 5314 16th Avenue, Suite 139 Brooklyn, NY 11204 | <u>Agent for Service of Process</u> WORLD GLOBAL FUND, LLC d/b/a LPG New York Secretary of State-as agent for service of process One Commerce Plaza, 99 Washington Avenue Albany, NY 11231 |
| 51. | <u>DEFENDANT</u> WORLD GLOBAL FUND, LLC d/b/a MNS Funding | <u>Agent</u> WORLD GLOBAL FUND, LLC d/b/a MNS Funding c/o File Right LLC 5314 16th Avenue, Suite 139 Brooklyn, NY 11204 | <u>Agent for Service of Process</u> WORLD GLOBAL FUND, LLC d/b/a MNS Funding New York Secretary of State-as agent for service of process One Commerce Plaza, 99 Washington Avenue Albany, NY 11231 |
| 52. | <u>DEFENDANT</u> WORLD GLOBAL FUND, LLC d/b/a Parkside Capital | <u>Agent</u> WORLD GLOBAL FUND, LLC d/b/a Parkside Capital c/o File Right LLC 5314 16th Avenue, Suite 139 Brooklyn, NY 11204 | <u>Agent for Service of Process</u> WORLD GLOBAL FUND, LLC d/b/a Parkside Capital New York Secretary of State-as agent for service of process One Commerce Plaza, 99 Washington Avenue Albany, NY 11231 |

Service by U.S. Mail

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| 53. | <u>DEFENDANT</u> WORLD GLOBAL FUND, LLC d/b/a Prime Funding Group | <u>Agent</u> WORLD GLOBAL FUND, LLC d/b/a Prime Funding Group c/o File Right LLC 5314 16th Avenue, Suite 139 Brooklyn, NY 11204 | <u>Agent for Service of Process</u> WORLD GLOBAL FUND, LLC d/b/a Prime Funding Group New York Secretary of State-as agent for service of process One Commerce Plaza, 99 Washington Avenue Albany, NY 11231 |
| 54. | <u>DEFENDANT</u> WORLD GLOBAL FUND, LLC d/b/a PSF | <u>Agent</u> WORLD GLOBAL FUND, LLC d/b/a PSF c/o File Right LLC 5314 16th Avenue, Suite 139 Brooklyn, NY 11204 | <u>Agent for Service of Process</u> WORLD GLOBAL FUND, LLC d/b/a PSF New York Secretary of State-as agent for service of process One Commerce Plaza, 99 Washington Avenue Albany, NY 11231 |
| 55. | <u>DEFENDANT</u> WORLD GLOBAL FUND, LLC d/b/a Rapid Cap | <u>Agent</u> WORLD GLOBAL FUND, LLC d/b/a Rapid Cap c/o File Right LLC 5314 16th Avenue, Suite 139 Brooklyn, NY 11204 | <u>Agent for Service of Process</u> WORLD GLOBAL FUND, LLC d/b/a Rapid Cap New York Secretary of State-as agent for service of process One Commerce Plaza, 99 Washington Avenue Albany, NY 11231 |
| 56. | <u>DEFENDANT</u> WORLD GLOBAL FUND, LLC d/b/a Safe Vault | <u>Agent</u> WORLD GLOBAL FUND, LLC d/b/a Safe Vault c/o File Right LLC 5314 16th Avenue, Suite 139 Brooklyn, NY 11204 | <u>Agent for Service of Process</u> WORLD GLOBAL FUND, LLC d/b/a Safe Vault New York Secretary of State-as agent for service of process One Commerce Plaza, 99 Washington Avenue Albany, NY 11231 |
| 57. | <u>DEFENDANT</u> WORLD GLOBAL FUND, LLC d/b/a Slate Advance | <u>Agent</u> WORLD GLOBAL FUND, LLC d/b/a Slate Advance c/o File Right LLC 5314 16th Avenue, Suite 139 Brooklyn, NY 11204 | <u>Agent for Service of Process</u> WORLD GLOBAL FUND, LLC d/b/a Slate Advance New York Secretary of State-as agent for service of process One Commerce Plaza, 99 Washington Avenue Albany, NY 11231 |

Service by U.S. Mail

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| 58. | <u>DEFENDANT</u> WORLD GLOBAL FUND, LLC d/b/a Supreme Funding | <u>Agent</u> WORLD GLOBAL FUND, LLC d/b/a Supreme Funding c/o File Right LLC 5314 16th Avenue, Suite 139 Brooklyn, NY 11204 | <u>Agent</u> WORLD GLOBAL FUND, LLC d/b/a Supreme Funding New York Secretary of State-as agent for service of process One Commerce Plaza, 99 Washington Avenue Albany, NY 11231 |
| 59. | <u>DEFENDANT</u> WORLD GLOBAL FUND, LLC d/b/a Tot Capital | <u>Agent</u> WORLD GLOBAL FUND, LLC d/b/a Tot Capital c/o File Right LLC 5314 16th Avenue, Suite 139 Brooklyn, NY 11204 | <u>Agent for Service of Process</u> WORLD GLOBAL FUND, LLC d/b/a Tot Capital New York Secretary of State-as agent for service of process One Commerce Plaza, 99 Washington Avenue Albany, NY 11231 |
| 60. | <u>DEFENDANT</u> WORLD GLOBAL FUND, LLC d/b/a Vertex Capital | <u>Agent</u> WORLD GLOBAL FUND, LLC d/b/a Vertex Capital c/o File Right LLC 5314 16th Avenue, Suite 139 Brooklyn, NY 11204 | <u>Agent for Service of Process</u> WORLD GLOBAL FUND, LLC d/b/a Vertex Capital New York Secretary of State-as agent for service of process One Commerce Plaza, 99 Washington Avenue Albany, NY 11231 |
| 61. | <u>DEFENDANT</u> WORLD GLOBAL FUND, LLC d/b/a Vulcan Consulting Group | <u>Agent</u> WORLD GLOBAL FUND, LLC d/b/a Vulcan Consulting Group c/o File Right LLC 5314 16th Avenue, Suite 139 Brooklyn, NY 11204 | <u>Agent for Service of Process</u> WORLD GLOBAL FUND, LLC d/b/a Vulcan Consulting Group New York Secretary of State-as agent for service of process One Commerce Plaza, 99 Washington Avenue Albany, NY 11231 |
| 62. | <u>DEFENDANT</u> WORLD GLOBAL FUND, LLC d/b/a W.B. Fund | <u>Agent</u> WORLD GLOBAL FUND, LLC d/b/a W.B. Fund c/o File Right LLC 5314 16th Avenue, Suite 139 Brooklyn, NY 11204 | <u>Agent for Service of Process</u> WORLD GLOBAL FUND, LLC d/b/a W.B. Fund New York Secretary of State-as agent for service of process One Commerce Plaza, 99 Washington Avenue Albany, NY 11231\ |

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| 63. | <u>DEFENDANT</u> WORLD GLOBAL FUND, LLC d/b/a Weinman and Associates | <u>Agent</u> WORLD GLOBAL FUND, LLC d/b/a Weinman and Associates c/o File Right LLC 5314 16th Avenue, Suite 139 Brooklyn, NY 11204 | <u>Agent for Service of Process</u> WORLD GLOBAL FUND, LLC d/b/a Weinman and Associates New York Secretary of State-as agent for service of process One Commerce Plaza, 99 Washington Avenue Albany, NY 11231 |
| 64. | <u>DEFENDANT</u> WORLD GLOBAL FUND, LLC d/b/a WGF Capital | <u>Agent</u> WORLD GLOBAL FUND, LLC d/b/a WGF Capital c/o File Right LLC 5314 16th Avenue, Suite 139 Brooklyn, NY 11204 | <u>Agent for Service of Process</u> WORLD GLOBAL FUND, LLC d/b/a WGF Capital New York Secretary of State-as agent for service of process One Commerce Plaza, 99 Washington Avenue Albany, NY 11231 |
| 65. | <u>DEFENDANT</u> WORLD GLOBAL FUND, LLC n/k/a Glass Media, LLC | <u>Agent for Service of Process</u> WORLD GLOBAL FUND, LLC n/k/a Glass Media, LLC Cloud Peak Law 1095 Sugar View Drive, Suite 500 Sheridan, WY 82801 | <u>Agent for Service of Process</u> WORLD GLOBAL FUND, LLC n/k/a Glass Media, LLC Wyoming Secretary of State-as agent for service of process 122 West 25th Street, Suite 101 Cheyenne, WY 82002 |
| 66. | <u>DEFENDANT</u> WORLD GLOBAL FUND | <u>Agent for Service of Process</u> WORLD GLOBAL FUND Cloud Peak Law 1095 Sugar View Drive, Suite 500 Sheridan, WY 82801 | <u>Agent for Service of Process</u> WORLD GLOBAL FUND Wyoming Secretary of State-as agent for service of process 122 West 25th Street, Suite 101 Cheyenne, WY 82002 |

| | | | |
|----|---|---|---|
| 1. | <u>DEFENDANT</u> OptimumBank 2929 E. Commercial Blvd., Suite 101 Ft. Lauderdale, FL 33308 | <u>Agent for Service of Process and Officer</u> OptimumBank c/o Timothy Terry, President & CEO 2929 E. Commercial Blvd., Suite 101 Ft. Lauderdale, FL 33308 | |
| 2. | <u>DEFENDANT</u> OptimumBank Holdings, Inc. | <u>Agent for Service of Process</u> OptimumBank Holdings, Inc. c/o Zwelling, AVI 2929 E. Commercial Blvd., Suite 303 Ft. Lauderdale, FL 33308 | <u>Officer</u> OptimumBank Holdings, Inc. c/o Albert Finch, President 2929 E. Commercial Blvd., Suite 303 Ft. Lauderdale, FL 33308 |
| 3. | <u>DEFENDANT</u> OptimumBank.com | <u>Agent for Service of Process</u> OptimumBank.com c/o Mary Franco 2929 E. Commercial Blvd., Suite 101 Ft. Lauderdale, FL 33308 | <u>Officer</u> OptimumBank.com c/o Mary Franco, Vice President 2929 E. Commercial Blvd., Suite 101 Ft. Lauderdale, FL 33308 |

EXHIBIT B

1 CHRISTOPHER CELENTINO (131688)

Christopher.Celentino@dinsmore.com

2 CHRISTOPHER B. GHIO (259094)

Christopher.Ghio@dinsmore.com

3 YOSINA M. LISSEBECK (201654)

Yosina.Lissebeck@dinsmore.com

DINSMORE & SHOHL LLP

655 West Broadway, Ste 800

San Diego, CA 92101

6 Tele: (619) 400-0500

7 Fax: (619) 400-0501

8 KAREN S. HOCKSTAD (OH 61308)

Karen.Hockstad@dinsmore.com

9 MATTHEW H. SOMMER (OH 101721; NC 51004)

Matthew.Sommer@dinsmore.com

10 **DINSMORE & SHOHL LLP**

191 W. Nationwide Blvd., Ste 200

Columbus, OH 43215

12 Tele: (614) 628-6880

13 Fax: (614) 628-6890

(Admitted pro hac vice)

14 Attorneys for Richard A. Marshack,

15 Trustee of the LPG Liquidating Trust

16 **UNITED STATES BANKRUPTCY COURT**

17 **CENTRAL DISTRICT OF CALIFORNIA**

18 **SANTA ANA DIVISION**

19 In re:

20 THE LITIGATION PRACTICE GROUP P.C.,

21 Debtor.

Case No. 8:23-bk-10571-SC

Chapter 11

Adv. Proc. No. 8:25-ap-01105-SC

23 RICHARD A. MARSHACK,
Trustee of the LPG Liquidation Trust,

24 Plaintiff,

25 v.

26 World Global Fund, LLC, et al.,

28 Defendants.

**DECLARATION OF KAREN S.
HOCKSTAD IN SUPPORT OF
PLAINTIFF'S REQUEST FOR ENTRY OF
DEFAULT UNDER LBR 7055-1**

Judge: Honorable Scott C. Clarkson

Place: 411 West Fourth Street

Courtroom 5C

Santa Ana, CA 92701

1 I, KAREN S. HOCKSTAD, declare as follows:

2 1. I am an attorney duly licensed to practice law and admitted to practice before this
3 Court *pro hac vice*. I am a partner with the law firm Dinsmore & Shohl LLP, and counsel of record
4 for Richard A. Marshack, Trustee (“Trustee” or “Plaintiff”) of the LPG Liquidation Trust. As such,
5 except as expressly stated otherwise, I have personal knowledge of the facts as set forth below and
6 could and would competently testify under oath thereto if requested to do so.

7 2. I make this declaration in support of the Request for Entry of Default (“Request for
8 Entry”) submitted concurrently herewith pursuant to Local Bankruptcy Rule 7055-1(a).

9 3. On March 10, 2025, on behalf of Plaintiff, my office filed a Complaint in the above-
10 titled action.

11 4. On March 18, 2025, our office served the Complaint along with the Summons,
12 Notice of Required Compliance with Rule 7026 of the Federal Rules of Bankruptcy Procedure and
13 Rule 7026-1 of the Local Bankruptcy Rules, and Order Re Early Meeting of Counsel, Status
14 Conference Instructions, and General Procedures (“Summons”) on Defendant, MNS Funding LLC,
15 d/b/a/ Legal Fees Network, d/b/a/ The Genesis Equity Group (“Defendant”) by mail service at the
16 following addresses:

17 MNS Funding LLC
18 c/o File Right LLC
19 5314 16th Avenue, Suite 139
20 Brooklyn, NY 11204

21 MNS Funding LLC
22 New York Secretary of State as agent for service of process
23 One Commerce Plaza
24 99 Washington Avenue
25 Albany, NY 11231

26 MNS Funding LLC, d/b/a/ The Genesis Equity Group
27 c/o The LLC
28 5314 16th Avenue, Suite 139
Brooklyn, NY 11204

1 MNS Funding LLC, d/b/a/ The Genesis Equity Group
2 New York Secretary of State as agent for service of process
3 One Commerce Plaza
4 99 Washington Avenue
5 Albany, NY 11231

6 MNS Funding LLC, d/b/a/ Legal Fees Network
7 c/o The LLC
8 5314 16th Avenue, Suite 139
9 Brooklyn, NY 11204

10 MNS Funding LLC, d/b/a/ Legal Fees Network
11 New York Secretary of State as agent for service of process
12 One Commerce Plaza
13 99 Washington Avenue
14 Albany, NY 11231

15 5. A copy of screenshots taken from the New York Secretary of State's website
16 displaying the current Registered Agent for Defendant and Defendant's assumed name history is
17 attached hereto as Exhibit 1.

18 6. A conformed copy of the completed Summons showing service of the Summons and
19 Complaint is attached to the Request for Default as Exhibit A.

20 7. Prior to the answer date, counsel for Dembitzer requested a stay of the Adversary
21 Proceeding against himself, World Global Fund, and MNS Funding LLC. The Trustee further
22 determined that a stay as to SSD Investment Group, LLC was appropriate as Dembitzer is the
23 authorized representative of SSD Investment Group, LLC.

24 8. This Court approved the Stipulation and set the answer date for October 14, 2025.
25 [Docket No. 158].

26 9. Defendants' response to the Complaint was due on October 14, 2025.

27 10. As of the date of this Declaration, I have not received any responsive pleading to the
28 Complaint from the Defendant. I have also reviewed the docket on Pacer for this action and did not
see any responsive pleading filed by the Defendant.

11. As such, I request that default be entered against the Defendants in this adversary
case.

1 I declare under penalty of perjury under the laws of the United States of America that the
2 foregoing is true and correct.

3 Executed this 20th day of October, 2025 at Columbus, Ohio.

4
5 /s/ Karen S. Hockstad
6 KAREN S. HOCKSTAD
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EXHIBIT 1

ENTITY NAME: MNS FUNDING LLC**DOS ID:** 5965842**FOREIGN LEGAL NAME:****FICTITIOUS NAME:****ENTITY TYPE:** DOMESTIC LIMITED LIABILITY COMPANY**DURATION DATE/LATEST DATE OF DISSOLUTION:****SECTIONOF LAW:** 203 LLC - LIMITED LIABILITY COMPANY LAW**ENTITY STATUS:** ACTIVE**DATE OF INITIAL DOS FILING:** 03/17/2021**REASON FOR STATUS:****EFFECTIVE DATE INITIAL FILING:****INACTIVE DATE:****FOREIGN FORMATION DATE:****STATEMENT STATUS:** PAST DUE**COUNTY:** KINGS**NEXT STATEMENT DUE DATE:** 03/31/2023**JURISDICTION:** NEW YORK, UNITED STATES**NFP CATEGORY:**

ENTITY DISPLAY

NAME HISTORY

FILING HISTORY

MERGER HISTORY

ASSUMED NAME HISTORY

Service of Process on the Secretary of State as Agent

The Post Office address to which the Secretary of State shall mail a copy of any process against the corporation served upon the Secretary of State by personal delivery:

Name: THE LLC**Address:** 5314 16TH AVENUE, SUITE 139, BROOKLYN, NY, UNITED STATES, 11204**Electronic Service of Process on the Secretary of State as agent:** Not Permitted

Chief Executive Officer's Name and Address

Name:**Address:**

Principal Executive Office Address

Address:

Registered Agent Name and Address

Name: FILE RIGHT LLC**Address:** 5314 16TH AVENUE, SUITE 139, BROOKLYN, NY, 11204

Entity Primary Location Name and Address

Name:**Address:**

Farmcorpflag

Is The Entity A Farm Corporation: NO



Department of State

Division of Corporations

Entity Assumed Name History

Return to Results

Return to Search

Entity Details



ENTITY NAME: MNS FUNDING LLC

DOS ID: 5965842

FOREIGN LEGAL NAME:

FICTITIOUS NAME:

ENTITY TYPE: DOMESTIC LIMITED LIABILITY COMPANY

DURATION DATE/LATEST DATE OF DISSOLUTION:

SECTIONOF LAW: 203 LLC - LIMITED LIABILITY COMPANY LAW

ENTITY STATUS: ACTIVE

DATE OF INITIAL DOS FILING: 03/17/2021

REASON FOR STATUS:

EFFECTIVE DATE INITIAL FILING: 03/17/2021

INACTIVE DATE:

FOREIGN FORMATION DATE:

STATEMENT STATUS: PAST DUE

COUNTY: KINGS

NEXT STATEMENT DUE DATE: 03/31/2023

JURISDICTION: NEW YORK, UNITED STATES

NFP CATEGORY:



ENTITY DISPLAY

NAME HISTORY

FILING HISTORY

MERGER HISTORY

ASSUMED NAME HISTORY

Search

| File Date | Assumed Name | Assumed Name ID | Status | Principal Location |
|------------|--------------------------|-----------------|--------|--------------------|
| 01/15/2025 | LEGAL FEES NETWORK | 7509915 | Active | |
| 06/04/2021 | THE*GENESIS EQUITY GROUP | 590669 | Active | |

Rows per page:

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1-2 of 2

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PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:
191 W. Nationwide Blvd, Suite 200, Columbus, OH 43215

A true and correct copy of the foregoing document entitled: **NOTICE OF MOTION FOR ORDER WITHOUT HEARING PURSUANT TO LBR 9013-1(p) or (q)** will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On *(date)* 10/20/2025, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☒ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On *(date)* 10/20/2025, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

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☒ Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL *(state method for each person or entity served)*: Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on *(date)* _____, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

10/20/2025
Date

Karen S. Hockstad
Printed Name

/s/ Karen S. Hockstad
Signature

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):

Joseph Boufadel on behalf of Defendant Slate Advance LLC
jboufadel@salvatoboufadel.com, Gsalvato@salvatoboufadel.com;gsalvato@ecf.inforuptcy.com

Joseph Boufadel on behalf of Interested Party Courtesy NEF
jboufadel@salvatoboufadel.com, Gsalvato@salvatoboufadel.com;gsalvato@ecf.inforuptcy.com

Christopher Ghio on behalf of Plaintiff Richard A Marshack
Christopher.Ghio@dinsmore.com, bonnie.connolly@dinsmore.com

Karen Hockstad on behalf of Plaintiff Richard A Marshack
karen.hockstad@dinsmore.com, kim.beavin@dinsmore.com

Karen Hockstad on behalf of Trustee Richard A Marshack (TR)
karen.hockstad@dinsmore.com, kim.beavin@dinsmore.com

Brandon J. Iskander on behalf of Interested Party Courtesy NEF
biskander@goeforlaw.com, kmurphy@goeforlaw.com;jfountain@goeforlaw.com

Ira David Kharasch on behalf of Defendant Genesis Equity Group Funding LLC
ikharasch@pszjlaw.com

Ira David Kharasch on behalf of Defendant Solomon Feig
ikharasch@pszjlaw.com

Yosina M Lissebeck on behalf of Plaintiff Richard A Marshack
Yosina.Lissebeck@Dinsmore.com,
caron.burke@dinsmore.com;ayrton.celentino@dinsmore.com

Richard A Marshack (TR)
pkraus@marshackhays.com, ecf.alert+Marshack@titlexi.com

Victoria Newmark on behalf of Defendant Genesis Equity Group Funding LLC
vnewmark@pszjlaw.com,
hdaniels@pszjlaw.com;bdassa@pszjlaw.com;hwinograd@pszjlaw.com

Victoria Newmark on behalf of Defendant Solomon Feig
vnewmark@pszjlaw.com,
hdaniels@pszjlaw.com;bdassa@pszjlaw.com;hwinograd@pszjlaw.com

Brian A Paino on behalf of Defendant Optimum Bank Holdings, Inc.
bpaino@hinshawlaw.com, hmosothoane@hinshawlaw.com;crico@hinshawlaw.com

Brian A Paino on behalf of Defendant Optimumbank
bpaino@hinshawlaw.com, hmosothoane@hinshawlaw.com;crico@hinshawlaw.com

Brian A Paino on behalf of Defendant Optimumbank.com
bpaino@hinshawlaw.com, hmosothoane@hinshawlaw.com;crico@hinshawlaw.com

Brian A Paino on behalf of Defendant Moishe Gubin
bpaino@hinshawlaw.com, hmosothoane@hinshawlaw.com;crico@hinshawlaw.com

Matthew Sommer on behalf of Plaintiff Richard A Marshack
matthew.sommer@dinsmore.com, carrie.davis@dinsmore.com

Matthew Sommer on behalf of Trustee Richard A Marshack (TR)
matthew.sommer@dinsmore.com, carrie.davis@dinsmore.com

United States Trustee (SA)
ustpreion16.sa.ecf@usdoj.gov

2. TO BE SERVED BY UNITED STATES MAIL:

Defendant, MNS Funding LLC, d/b/a/ Legal Fees Network, d/b/a/ The Genesis Equity Group

MNS Funding LLC
c/o File Right LLC
5314 16th Avenue, Suite 139
Brooklyn, NY 11204

Defendant, MNS Funding LLC, d/b/a/ Legal Fees Network, d/b/a/ The Genesis Equity Group

MNS Funding LLC
New York Secretary of State as agent for service of process
One Commerce Plaza
99 Washington Avenue
Albany, NY 11231

Defendant, MNS Funding LLC, d/b/a/ Legal Fees Network, d/b/a/ The Genesis Equity Group

MNS Funding LLC, d/b/a/ The Genesis Equity Group
c/o The LLC
5314 16th Avenue, Suite 139
Brooklyn, NY 11204

Defendant, MNS Funding LLC, d/b/a/ Legal Fees Network, d/b/a/ The Genesis Equity Group

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MNS Funding LLC, d/b/a/ Legal Fees Network
New York Secretary of State as agent for service of process
One Commerce Plaza
99 Washington Avenue
Albany, NY 11231

Other Parties

Funding Gateway, Inc.
Mark Fuchs c/o The Corporation
5314 16th Avenue, Suite 139
Brooklyn, NY 11204

Funding Gateway, Inc.
Mark Fuchs, c/o File Right RA Services, LLC
330 Changebridge Road, Suite 101
Pine Brook, NY 07058

MNS Funding LLC
And each of its assumed names
c/o Shia Dembitzer
202 Foster Avenue, Apt. 5
Brooklyn, NY 11230

Shia Dembitzer
202 Foster Avenue, Apt. 5
Brooklyn, NY 11230
SSD Investment Group, LLC
14400 Bear Valley Road, Space 527
Victorville, CA 92394

SSD Investment Group, LLC
c/o Natesh Singh Dole
13745 Holt Ct.
Victorville, CA 92394

World Global Fund, LLC
And each of its assumed names
c/o Shia Dembitzer
202 Foster Avenue, Apt. 5
Brookly, NY 11230

SSD Investment Group, LLC
ATTN: Shia Dembitzer
7901 4th Street N., Suite 5765
St. Petersburg, FL 33702

World Global Fund, LLC n/k/a Glass Media, LLC
Andrew Pierce, c/o Cloud Peak Law
1095 Sugar View Drive, Suite 500
Sheridan, WY 82801

Funding Gateway, Inc.
And each of its assumed names
c/o Cloud Peak Law
1095 Sugar View Drive, Suite 500
Sheridan, WY 82801

Judge's Copy

Honorable Scott C. Clarkson
United States Bankruptcy Court
Central District of California
411 West Fourth Street, Suite 5130 / Courtroom 5C
Santa Ana, CA 92701-4593